



MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

SHIVANI R. DAMERA
Assistant Corporation Counsel
Labor and Employment Law Division
Telephone: (212) 356-2444
E-mail: sdamera@law.nyc.gov

February 20, 2025

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Daniel Chavez v. City of New York
1:23-cv-7754 (NCM) (TAM)

Dear Judge Merkl:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, attorney for the defendant in the above-referenced action. I write on behalf of the parties pursuant to Your Honor's Order dated December 11, 2024, directing parties to file a joint status report certifying the close of fact discovery by February 21, 2025. See ECF Minute Entry + Order dated December 11, 2024.

On December 11, 2024, the Court extended discovery to February 4, 2025 for the purpose of Plaintiff taking two additional depositions and serving any related post-deposition discovery demands. See ECF Minute Entry + Order dated December 11, 2024. The first deposition was completed on January 28, 2025 and the second deposition was completed on January 30, 2025. On February 14, 2025, fact discovery was concluded.

Defendant intends to file a post-discovery motion for summary judgment on the grounds that Plaintiff has failed to raise an issue of material fact as to Plaintiff's failure to accommodate claims and that Defendant is entitled to summary judgment as a matter of law. Defendant's pre-motion conference letter in anticipation of a summary judgment motion is due March 21, 2025.

Respectfully submitted,
/s/ Shivani Damera
Shivani R. Damera
Assistant Corporation Counsel

cc: All Parties of Record (By ECF)